

Amtrak

November 20, 1995

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Radio Frequencies
PR Docket No. 92-235

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Dear Mr. Caton:

The National Railroad Passenger Corporation (Amtrak) is writing to advise the Federal Communications Commission of its comments on the report and order and further notice of proposed rulemaking that was adopted by the Commission June 15, 1995 in this proceeding. Amtrak is the railroad entity that has been established pursuant to the Rail Passenger Service Act, 49 U.S.C. Section 24101 et seq., for the purpose of providing intercity rail passenger service throughout the United States. Amtrak operates intercity trains on a regularly scheduled basis on more than 20,000 route miles in the United States and carries more than 50 million passengers per year on intercity and commuter passenger trains that we operate.

Amtrak is a member of the Association of American Railroads, which is filing lengthy comments in this proceeding, and Amtrak supports those comments with respect to the important issue of radio frequencies available for railroad operations. In addition to the major practical problems and inefficiencies that would be created by pooling railroad radio frequencies with numerous unrelated functions in a wide spectrum, Amtrak is most concerned about the potential safety problems associated with delayed or unclear communications that are likely to result from the type of mixed use that is being proposed by the Commission in the current proceeding. Amtrak is especially concerned about the elements of the proposal that would allow any frequency coordinator to make decisions about the control and use of channels that railroads must use, regardless of whether the coordinator was knowledgeable about the intricacies and complexities of railroad operations.

As previously indicated, Amtrak operates trains on a nationwide route system and it is essential that our equipment be able to move flexibly between different parts of the country. The complexity of the proposed new consolidation of frequencies will jeopardize the flexibility that now exists in the use of the equipment of Amtrak and other railroads in this country that

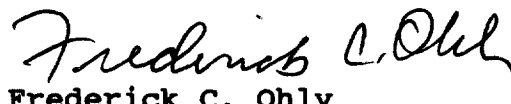
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operate long-distance trains. Amtrak and the railroad industry are unique among land mobile radio users. Unlike the interstate trucking industry that has no requirement to maintain two-way radio communications between dispatcher and driver, the railroad industry is required by the Federal Railroad Administration to provide two-way radio communications with the engineer on the locomotive. The airline industry is the only other industry that operates on the same scale and under similar requirements for communications. The airline industry has 760 channels dedicated solely for communications to aircraft. The railroad industry should retain the 91 radio channels currently dedicated to railroad operations.

Interoperability with other railroads is a vital concern to Amtrak. With the 91 channels now available in the VHF railroad allocation, Amtrak assures interoperability with the many freight railroads over whose rights-of-way we operate by installing a 91-channel radio in every Amtrak road locomotive. If the radio channels allocated to the railroad industry are combined into a large pool of channels supporting a variety of modulation and trunking technologies, it will become difficult or impossible for Amtrak to provide a single radio that will work throughout the North American railroad system. Amtrak will then be forced to change out the locomotive radio as our trains travel from one territory to another. It will be a significant financial burden for Amtrak to maintain the necessary pool of radios at every transition point. Equipment failure is often related to excessive handling, and the increased handling will increase the likelihood of equipment failure enroute.

The present system of radio channels assigned for railroad use, which is coordinated by the Association of American Railroads, has worked safely and efficiently for the railroad industry. Amtrak does not favor changing this arrangement. We do hope that the Commission will pay special attention to the critical safety concern involved in passenger railroad operations in its further deliberations in this proceeding. We appreciate the consideration that we are confident the Commission will give to our comments.

Sincerely,


Frederick C. Ohly
Associate General Counsel

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